

LEO P. CUNNINGHAM, SBN 121605
DAVID H. KRAMER, SBN 168452
MAURA L. REES, SBN 191698
MICHAEL H. RUBIN, SBN 214636
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
650 Page Mill Road
Palo Alto, CA 94304-1050
Telephone: (650) 493-9300
Facsimile: (650) 565-5100
Email: mrubin@wsgr.com

Attorneys for Defendant Google Inc.

CAROL LYNN THOMPSON, SBN 148079
SIDLEY AUSTIN LLP
555 California Street
San Francisco, CA 94104
Telephone: (415) 772-1291
Facsimile: (415) 772-7400
Email: cthompson@sidley.com

ALAN CHARLES RAUL (*not admitted*)
EDWARD R. MCNICHOLAS (*not admitted*)
SIDLEY AUSTIN LLP
1501 K. Street, N.W.
Washington, DC 20005
Telephone: (202) 736-8497
Facsimile: (202) 736-8711
Email: araul@sidley.com
Email: emcnicholas@sidley.com

Attorneys for Defendant PointRoll Inc.

BRIAN R. STRANGE, SBN 103252
STRANGE & CARPENTER
12100 Wilshire Boulevard
Suite 1900
Los Angeles, CA
Telephone: (310) 207-5055
Facsimile: (310) 826-3210
Email: lacounsel@earthlink.net

JOSEPH H. MALLEY (*not admitted*)
LAW OFFICE OF JOSEPH MALLEY
1045 North Zang Boulevard
Dallas, TX 75208
Telephone: (214) 943-6100
Email: malleylaw@gmail.com

Attorneys for Plaintiff Lourdes Villegas

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

LOURDES VILLEGAS, an individual on behalf
of herself and all others similarly situated,

Plaintiff,

v.

GOOGLE INC., a Delaware Corporation and
POINTROLL, INC., a Delaware Corporation,

Defendants.

CASE NO.: 5:12-cv-00915-LHK

**STIPULATED REQUEST FOR AN
ORDER GRANTING A STAY
AND [~~PROPOSED~~] ORDER**

1 Plaintiff Lourdes Villegas (“Plaintiff”), Defendant Google Inc. (“Google”), and
2 Defendant PointRoll Inc. (“PointRoll”) (collectively, the “Stipulating Parties”) by and through
3 their respective counsel, hereby make a stipulated request for an Order staying all proceedings
4 and deadlines in this action until forty-five (45) days after the Judicial Panel on Multidistrict
5 Litigation (“JPML”) issues a ruling on any motion seeking transfer of this and other related
6 actions pending in other districts, and in support of this Request, state as follows:

7 WHEREAS, the Complaint in the above-captioned action was filed on February 23,
8 2012;

9 WHEREAS, multiple other complaints have been filed to date in federal district courts
10 throughout the United States by plaintiffs purporting to bring class actions on behalf of similarly
11 situated class members (collectively, including the above-captioned matter, the “Google Cases”);

12 WHEREAS, on March 1, 2012, Defendant Google Inc. filed a motion with the JPML
13 seeking transfer of the Google Cases pursuant to 28 U.S.C. § 1407, and other parties to the
14 Google Cases may also file motions pursuant to 28 U.S.C. § 1407 (collectively “MDL Motion”);

15 WHEREAS, in light of Google’s filing of an MDL Motion, all parties in this case have
16 agreed that the deadline for Google and PointRoll to answer, move, or otherwise respond to the
17 Complaint shall be stayed until forty-five (45) days after the JPML issues an order deciding the
18 MDL Motion, or as otherwise ordered by the MDL Transferee Court if the MDL Motion (or any
19 other motion filed with the JPML seeking to transfer the Google Cases) is granted; provided,
20 however, that in the event that Google or PointRoll should agree to an earlier response date in
21 any of the Google Cases, Google or PointRoll (whichever party so agreed) will respond to the
22 Complaint on that earlier date;

23 WHEREAS, there have been no previous modifications of time in this case, whether by
24 stipulation or Court order, and the requested stay is necessary for consistent management of the
25 actions to be transferred and to save judicial resources;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for Plaintiff, Google, and PointRoll that:

1. All proceedings and deadlines in the above-captioned action are stayed until forty-five (45) days after the JPML rules on the MDL Motion or until further order of this Court or the MDL Transferee Court;
2. This stay shall encompass Google's and PointRoll's deadlines to answer, move to dismiss, or otherwise respond to the Complaint;
3. Any obligations of the parties to meet and confer regarding initial disclosures, including under FRCP 26(f), are stayed until further Order from the Court or the MDL Transferee Court;
4. This Order does not constitute a waiver by Google or PointRoll of any defense, including but not limited to the defenses of lack of personal jurisdiction, subject matter jurisdiction, improper venue, sufficiency of process, or service of process; and
5. Nothing in this Order shall prohibit any party in the above-captioned action from petitioning the court to lift the stay as events warrant.

Agreed by all Stipulating Parties this 16th day of March, 2012.

WILSON SONSINI GOODRICH & ROSATI

By: /s/ *Michael H. Rubin*

Leo P. Cunningham

David H. Kramer

Maura L. Rees

Michael H. Rubin

650 Page Mill Road

Palo Alto, CA 94304-1050

Telephone: (650) 493-9300

Facsimile: (650) 565-5100

Email: mrubin@wsgr.com

Attorneys for Defendant Google Inc.

1 **SIDLEY AUSTIN**

2 By: /s/ Carol Lynn Thompson
3 Carol Lynn Thompson
4 555 California Street
5 San Francisco, CA 94104
6 Telephone: (415) 772-1291
7 Facsimile: (415) 772-7400
8 Email: cthompson@sidley.com

9 Alan Charles Raul
10 Edward R. McNicholas
11 1501 K. Street, N.W.
12 Washington, DC 20005
13 Telephone: (202) 736-8497
14 Facsimile: (202) 736-8711
15 Email: araul@sidley.com
16 Email: emcnicholas@sidley.com

17 *Attorneys for Defendant PointRoll Inc.*

18 **STRANGE & CARPENTER**

19 By: /s/ Brian R. Strange
20 Brian R. Strange
21 12100 Wilshire Boulevard
22 Suite 1900
23 Los Angeles, CA 90025
24 Telephone: (310) 207-5055
25 Facsimile: (310) 826-3210
26 Email: lacounsel@earthlink.net

27 Joseph H. Malley
28 LAW OFFICE OF JOSEPH MALLEY
1045 North Zang Boulevard
Dallas, TX 75208
Telephone: (214) 943-6100
Email: malleylaw@gmail.com

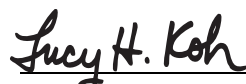
Attorneys for Plaintiff

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[PROPOSED] ORDER

The above stipulation having been considered and good cause appearing therefore,
PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: March 20, 2012



LUCY H. KOH
UNITED STATES DISTRICT JUDGE